

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, EX REL.,
RAÚL TORREZ, ATTORNEY GENERAL,

Plaintiff,

- v. -

META PLATFORMS, INC.; INSTAGRAM, LLC;
META PAYMENTS, INC.; META PLATFORMS
TECHNOLOGIES, LLC; and
MARK ZUCKERBERG,

Defendants.

Civ. No. 1:23-1115-DLM-KK

**META’S UNOPPOSED MOTION FOR EXTENSION OF PAGE LIMIT IN
CONNECTION WITH MOTION TO DISMISS**

Pursuant to D.N.M.LR-Civ. 7.5, Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (collectively, “Meta”) respectfully move this Court for a page-limit extension in connection with briefing on an expected Motion to Dismiss. Specifically, Meta seeks an extension such that its opening memorandum and Plaintiff’s response brief may be up to 35 pages, and its reply brief may be up to 17 pages. As grounds, Defendants state as follows:

1. Plaintiff’s Complaint is 223 pages in length, containing 521 paragraphs and four causes of action. The Complaint contains extensive factual allegations that give rise to complex legal issues to be addressed on a motion to dismiss.
2. Adequately addressing these factual allegations and legal issues on a motion to dismiss will require in excess of the page limits established under Local Rule 7.5. These circumstances, including the length of the Complaint and the complexity of the issues involved, justify the modest page extensions Meta seeks. *See Navajo Health Found.*—

Sage Mem'l Hosp. v. Burwell, 110 F. Supp. 3d 1140, 1181-82 (D.N.M. 2015) (discussing factors to be considered on motion for page extension).

3. By the filing this motion, Meta does not waive or prejudice any defense to the claims in the action .
4. Plaintiff has been contacted concerning its position on this motion and has advised that it does not oppose the relief sought herein.

CONCLUSION

For the foregoing reasons, Meta respectfully requests that this Court grant it leave to file a Motion to Dismiss not to exceed 35 pages in length, with a corresponding extension permitted on Plaintiff's response, and a reply brief not to exceed 17 pages in length.

DATED: December 20, 2023

Respectfully submitted,

HOLLAND & HART LLP

By: /s/ John C. Anderson
John C. Anderson
Olga M. Serafimova
110 North Guadalupe, Suite 1
Santa Fe, New Mexico 87501
Tel: 505.988.4421
jcanderson@hollandhart.com
omserafimova@hollandhart.com

- and -

COVINGTON & BURLING LLP

/s/ Nathan E. Shafroth
Nathan E. Shafroth (*pro hac vice* forthcoming)
California Bar No. 232505
Salesforth Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
Tel: (415) 591-7053
nshafroth@cov.com

Timothy C. Hester (*pro hac vice* forthcoming)
District of Columbia Bar No. 370707
One City Center
850 Tenth Street, NW
Washington, DC 20002-4956
Tel: (202) 662-5324
thester@cov.com

***Attorneys for Defendants Meta Platforms, Inc.,
Instagram, LLC, Meta Payments, Inc., and
Meta Platforms Technologies, LLC***

CERTIFICATE OF SERVICE

I certify that on December 20, 2023, I filed the foregoing electronically with the Clerk of Court using CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

James W. Grayson
Chief Deputy Attorney General
Raul Torrez, Attorney General of New Mexico
New Mexico Attorney General's Office
P.O. Drawer 1508
Santa Fe, NM 87504-1508
Phone: (505) 218-0850
Email: jgrayson@nmag.gov

Serena R. Wheaton
Assistant Attorney General
New Mexico Attorney General's Office
Consumer & Environmental Protection Division
201 Third Street NW, Suite 300
Albuquerque, NM 87102
Phone: (505) 490-4846
Email: swheaton@nmag.gov

Linda Singer
David I. Ackerman
Motley Rice LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Email: lsinger@motleyrice.com
Email: dackerman@motleyrice.com

/s/ John C. Anderson
John C. Anderson